

Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

NORA WILLIAMS,

Plaintiff,

v.

SEAN J. STACKLEY, ACTING
SECRETARY OF THE NAVY,

Defendant.

NO. C16-5945 BHS

**DECLARATION OF
CHALMERS C. JOHNSON**

**RE: OPPOSITION TO SUMMARY
JUDGMENT**

I, Chalmers C. Johnson, hereby make the following declarations:

1. I am over the age of 18, competent to testify in court, and I am giving this declaration under the laws of the state of Washington and under penalty of perjury.
2. I am counsel of record for the Plaintiff in this action.
3. Exhibit # 1 is a copy of the Approval of Reasonable Accommodations granted to the Plaintiff on December 31, 2014.
4. Exhibit # 2 is a copy of the declaration of Roy Rushing dated 2016.11.03.
5. Exhibit # 3 is copy of an email from Roy Rushing dated May 4, 2016.
6. Exhibit #4 is a copy of an email from Roy Rushing to Ms. Williams dated May 10, 2016.
7. Exhibit # 5 is a copy of Ms. Williams' Informal EEO complaint dated 5-10-16.
8. Exhibit # 6 is a copy of an email from Roy Rushing, dated May 12, 2016.
9. Exhibit # 7 is a copy of an email from Roy Rushing to Meranda Jackson dated May 13, 2016.

- 1 10. Exhibit # 8 is Ms. Williams' formal EEO complaint, dated June 8, 2016.
- 2
- 3 11. Exhibit # 9 is a Notice of Official Administrative Investigation dated August 8, 2016 for
- 4 Ms. Williams and one for George Karl.
- 5 12. Exhibit # 10 is an email from Ross Lund to George Karl with a cc to myself and Charles
- 6 Monie in which Mr. Lund stated that employees under administrative investigation are
- 7 not entitled to representation by counsel. It is followed by 5 CFR 555, which states that
- 8 an employee subject to such an interview is entitled to be accompanied by counsel.
- 9 13. Exhibit # 11 is an informal EEO complaint filed by Ms. Williams on August 25, 2016.
- 10 14. Exhibit # 12 is an email from myself to Counsel for the Agency requesting a meeting to
- 11 discuss Ms. Williams' Reasonable accommodations.
- 12 15. Exhibit # 13 is a letter of caution from LCDR Pitcairn dated February 10, 2017.
- 13 16. Exhibit # 14 is an excerpt of the deposition of Meranda Jackson taken on July 14, 2016.
- 14 17. Exhibit # 15 is a Supervisor's statement regarding Ms. Williams, signed by LCDR
- 15 Pitcairn.
- 16 18. Exhibit # 16 contains copies of medical letters and forms that Dr. Jensen has written and
- 17 were submitted to the Defendant.
- 18 19. Exhibit # 17 is a copy of the Defendant's responses to Plaintiff's interrogatories and
- 19 requests for production.
- 20 20. Exhibit # 18 contains copies of two emails from Leonard Shilling regarding Ms.
- 21 Williams, dated May 27, 2016 and June 2 2016.
- 22 21. Exhibit # 19 contains excerpts from a deposition of Charles Monie.
- 23 22. Exhibit # 20 contains excerpts from a deposition of Meranda Jackson.
- 24 23. Exhibit # 21 contains excerpts from a deposition of Nora Williams
- 25 24. All of the above documents have been produced during discovery in this case either from
- 26 Defendant to Plaintiff, from Plaintiff to Defendant, or are transcripts from depositions
- 27 attended by both parties.
- 28

1
2
3 July 3, 2018
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

s/Chalmers C. Johnson
Chalmers C. Johnson, WSBA # 40180

Declaration of Johnson – Opposing MSJ

GSJones Law Group, P.S.
1155 BETHEL AVE
PORT ORCHARD, WASHINGTON 98366
(360) 876-9221

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Declaration of Johnson – Opposing MSJ

GSJones Law Group, P.S.
1155 BETHEL AVE
PORT ORCHARD, WASHINGTON 98366
(360) 876-9221